

RADCOM Ltd.

CODE OF BUSINESS CONDUCT AND ETHICS

(As Amended and Restated November 10, 2021)

INTRODUCTION

RADCOM Ltd. (collectively with its subsidiaries, the “**Company**”) is committed to promoting high standards of honest and ethical business conduct and compliance with applicable laws, rules and regulations, in the internal relationships between its personnel and with Company’s customers, suppliers, partners, agents, contractors, shareholders and others. As part of this commitment, and in order to set expectations and provide guidance applicable to every employee, officer and director of the Company, the Company has adopted this Code of Business Conduct and Ethics (this “**Code**”).

All directors, officers, employees of the Company, and certain of the Company’s service providers, consultants and agents (such as finders, distributors, and resellers) of the Company who are contractually bound to adhere to this Code (“**Covered Persons**”) are expected to be familiar with this Code and to adhere to the principles set forth in this Code. It is your responsibility to read and understand this Code, and to use it as a guide to the performance of your responsibilities for the Company. You should exhibit the highest standard of business and professional integrity, and seek to avoid even the appearance of improper behavior.

This Code cannot and does not intend to address every ethical issue or circumstance that may arise, so in complying with this Code it is your responsibility to apply common sense, together with high personal standards of ethics, honesty and accountability. In addition, we expect you to comply with all other Company’s policies and procedures as may be amended from time to time and that apply to you, some which supplement this Code by providing more detailed guidance.

This Code is designed to implement the laws to which we are all subject, but it may in some aspects, go beyond legal obligations. To the extent the laws applicable to you are stricter than the standards that apply to you pursuant to this Code, this Code is not purported to derogate from such laws. In the event of any inconsistency between this Code and any law applicable to you, applicable law will prevail.

If you need help understanding this Code, you should contact either your supervisor, the Company’s Chief Financial Officer or General Counsel.

Anyone who violates the standards in this Code will be subject to disciplinary action, which, in appropriate circumstances, may include termination of employment, legal action or referral for criminal prosecution.

LEGAL COMPLIANCE

Obedying the law is the foundation on which Company’s ethical standards are built. All Covered Persons should respect and obey all laws, rules and regulations applicable to Company’s business and operations, both domestic and international.

CONFLICTS OF INTEREST

In order to maintain the highest degree of integrity in the conduct of Company’s business and to maintain your independent judgment, you must avoid any activity or personal interest that creates or appears to create a conflict between your interests and the interests of the Company. A conflict of interest occurs when your private interests interfere in any way, or even appear to interfere, with the interests of the Company as a whole. A conflict situation can arise when you take actions or have interests that make it difficult for you to perform your work at Company objectively and effectively. Conflicts of interest can also occur indirectly. Conflicts of interest may not always be clear-cut, and further review and discussions may be appropriate. Any Covered Person that

becomes aware of a conflict or potential conflict should bring it to the attention of the Chief Executive Officer, the Chief Financial Officer or General Counsel as appropriate in the circumstances.

INSIDER TRADING

All Covered Persons are prohibited from using “inside” or material non-public information about the Company, or about companies with which we do business, in connection with buying or selling our or such other companies’ securities, including “tipping” others who might make an investment decision on the basis of this information.

It is illegal, and it is a violation of this Code, to tip or to trade on inside information. The Company’s Insider Trading Policy provides guidance on the sorts of information that might be non-public and material for these purposes, and guidelines on when and how Covered Persons may purchase or sell shares of Company.

See the Company’s Insider Trading Policy for more information.

COMPETITION AND FAIR DEALING

The Company depends on its reputation for quality, service and integrity. You must never take unfair advantage of others through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practice.

CORPORATE BOOKS, RECORDS AND PUBLIC REPORTING

Covered Persons must complete all Company documents accurately, truthfully and in a timely manner. When applicable, documents must be properly authorized. Covered Persons must record financial activities in compliance with all applicable laws and accounting practices. The making of false or misleading entries, records or documentation is strictly prohibited. Covered Persons must never create a false or misleading report or make a payment or establish an account on behalf of the Company with the understanding that any part of the payment or account is to be used for a purpose other than as described by the supporting documents.

To help ensure the integrity of the Company’s records and public disclosure, the Company requires that:

- No entry be made in the Company’s books and records that is intentionally false or misleading;
- Transactions are supported by appropriate documentation;
- The terms of sales and other commercial transactions are reflected accurately in the documentation for those transactions and all such documentation is reflected accurately in the Company’s books and records;
- Covered Persons comply with the Company’s system of internal controls and are held accountable for their entries;
- Any off-balance sheet arrangements of the Company are clearly and appropriately disclosed;
- No cash or other assets are maintained for any purpose in any unrecorded or “off-the-books” fund; and
- Records are retained or destroyed according to the Company’s document retention policies or procedures then in effect.

As a public company, the Company is required to file various periodic reports with the Securities Exchange Commission. Every Covered Person of the Company who participates in the information gathering process for the Company’s public filings and other public communications is responsible for the timeliness and accuracy of the information contained therein in which he or she participates. No Covered Person should knowingly make (or cause or encourage any other person to make) any false or misleading statement in any of the Company’s reports filed with the Securities Exchange

Commission and or knowingly omit (or cause or encourage any other person to omit) any information necessary to make the disclosure in any of such reports accurate in all material respects.

If you become aware that the Company's public disclosures are not full, fair and accurate, or if you become aware of a transaction or development that you believe may require disclosure, you should report the matter immediately to your supervisor or the Chief Financial Officer.

Those persons having responsibility for particular areas of the Company's periodic reports such as the Form 20-F and Form 6-Ks (if any) must report to the Board of Directors on an ongoing basis the following matters which come to their attention:

- Deviations from or changes to the current public information available for the Company;
- Changes in risks, or new risks, to the Company as they are identified; and
- Changes that may affect the Company's financial results and operations.

MARKETING, ADVERTISING AND SALES

The Company does not engage in false or misleading claims to its customers, competitors or the public. The following specific policies apply:

- Marketing, advertising and sales materials will be clear and truthful. They will not contain false claims about the Company's products and services;
- Covered Persons should not make any offers or promises on behalf of the Company other than in accordance with Company's policies and guidelines; and
- Covered Persons should not encourage or knowingly use third parties, such as agents, consultants or subcontractors, to perform any activities that are prohibited under the Code.

It is Company's policy to disclose material information concerning the Company to the public only through specific limited channels to avoid inappropriate publicity and to ensure that all those with an interest in the Company will have equal access to information.

See the Company's Disclosure Policy for more information.

ANTI-FRAUD

The Board of Directors has adopted a Foreign Corrupt Practices Act ("FCPA") Policy providing for procedures regarding management of fraud risks in order to minimize the risk of any fraud being committed against or by the Company, either by any Covered Person or third parties and establishing rules against bribery, corruption and other prohibited acts.

See the Company's FCPA Policy for more information.

GIFTS AND ENTERTAINMENT

All Covered Persons must adhere to the highest ethical standards and be careful to avoid even the appearance of impropriety in giving or receiving gifts and entertainment. In general, a Covered Person cannot offer, provide or accept any gifts or entertainment in connection with his or her service to the Company except in a manner consistent with applicable laws and the Company's FCPA Policy, as amended from time to time.

See the Company's FCPA Policy for more information.

CONFIDENTIALITY

Covered Persons may learn, to a greater or lesser degree, facts about the Company's business, plans, operations or "secrets of success" that are not known to the general public or to competitors. Confidential information includes all non-public information that might be of use to competitors, or harmful to the Company or its customers or partners, if disclosed.

During the course of performing his or her responsibilities, a Covered Person may obtain information concerning possible transactions with other companies or receive confidential

information concerning other companies, which the Company may be under an obligation to maintain as confidential. The definition of “confidential information” changes from time to time and it is determined based on non-disclosure agreements signed with such companies. See **Annex A** for more information on what considered as “confidential information”. Covered Persons must maintain the confidentiality of information entrusted to them by the Company, its customers, suppliers and other partners, except when disclosure is legally mandated. Covered Persons must safeguard confidential information by keeping it secure, limiting access to those who have a need to know in order to do their job, and avoiding discussion of confidential information in public areas such as planes, elevators, and restaurants and on mobile phones. This prohibition includes, but is not limited to, inquiries made by the press, analysts, investors or others. Covered Persons also may not use such information for personal gain. These confidentiality obligations continue even after employment with the Company ends.

See the Company’s Insider Trading Policy for more information.

PROTECTION AND PROPER USE OF COMPANY ASSETS

Covered Persons are expected to protect the Company’s assets and ensure their efficient use for legitimate, lawful business purposes. Theft, carelessness and waste have a direct impact on our profitability. Company property, such as computer equipment, buildings, furniture and furnishings office supplies and products and inventories, should be used only for activities related to employment, engagement or provision of services to the Company, although incidental, legal personal use is permitted.

For addition information see the Company’s computer use policy.

The Company recognizes intellectual property rights as well as proprietary confidential information (collectively "IP") as a central shareholder value. Covered Persons shall take appropriate action to preserve and enhance the Company's IP and respect the IP rights of other persons and entities.

Any misuse or suspected misuse of our assets must be immediately reported to the Covered Person supervisor or the Company’s Chief Financial Officer or General Counsel, including by sending a complaint to the email address legal@radcom.com.

PERSONAL BEHAVIOR AND RESPECT FOR INDIVIDUALS

The Company strives, on a personal level, to treat each individual with dignity, consideration and respect. The Company has no tolerance for discrimination or harassment. All employment decisions are to be made without regard to race, color, age, gender, sexual orientation, religion, marital status, pregnancy, national origin/ancestry, citizenship, physical/mental disability, military status or any other basis prohibited by law. For purposes of this Code, harassment includes slurs and any other offensive remarks, jokes and other verbal, graphic, or physical conduct that could create an intimidating, hostile or offensive work environment. In addition to the above, "sexual harassment" includes unwelcome sexual advances, requests for sexual favors, and other visual, verbal, electronic, or physical conduct of a sexual nature.

For more information see the Company’s sexual harassment policy.

Use, sale, possession, purchase or transfer of alcohol or illegal drugs on Company premises, in Company vehicles or during work hours is prohibited, with the exception of alcohol consumption at company-sponsored functions that are approved by the management.

CORPORATE OPPORTUNITIES

All Covered Persons owe a duty to the Company to advance the interests of the Company when the opportunity to do so arises. Covered Persons are prohibited from directly or indirectly (a) taking personally for themselves opportunities that are discovered through the use of Company property,

information or positions; (b) using Company property, information or positions for personal gain; or (c) competing with the Company for business opportunities.

A Covered Person may not own, either directly or indirectly, a substantial interest in any business entity that does or seeks to do business with or is in competition with the Company without providing advance notice to the Audit Committee of the Board of Directors. Investments in publicly traded securities of companies amounting to less than five percent (5%) of the total outstanding shares of such company are permitted without such advanced notice.

ANTITRUST LAWS AND COMPETITION

The purpose of antitrust laws is to preserve fair and open competition and a free market economy, which are goals that the Company fully supports. A Covered Person must not directly or indirectly enter into any formal or informal agreement with competitors that fixes or controls prices, divides or allocates markets, limits the production or sale of products, boycotts certain suppliers or customers, eliminates competition or otherwise unreasonably restrains trade.

MONEY LAUNDERING, CRIMINAL PROPERTY AND TERRORIST FINANCING

Money laundering is the process by which people attempt to disguise illegally gained proceeds to make the proceeds appear to come from legitimate sources or activities, or, conversely, finance illegal activities using funds routed through legitimate sources. Covered Persons are required to comply with all applicable anti-money laundering laws. Covered Persons should act to ensure that the Company's assets and business are not used or utilized by any persons, be they directors, officers, employees, customers, suppliers or contractors, in any way so as to launder money, finance terrorism or deal with criminal property. Covered Persons should promptly report any knowledge or suspicion they have in this regard to their supervisor, or a Company officer.

POLITICAL CONTRIBUTIONS

A Covered Person may participate in the political process as individuals on his or her own time. However, a Covered Person must make every effort to ensure that Covered Persons do not create the impression that he or she speaks or acts on behalf of the Company with respect to political matters. Company contributions to any political candidate or party or to any other organization that might use the contributions for a political candidate or party are prohibited. A Covered Person may not receive any reimbursement from corporate funds for personal political contributions.

PERSONAL CONDUCT AND SOCIAL MEDIA POLICY

A Covered Person is encouraged to conduct itself in a responsible, respectful, and honest manner at all times, including when presenting in public settings, as well as online and in web-based forums or networking sites. The Company understands that a Covered Person may wish to create and maintain a personal presence online using various forms of social media. However, in so doing the a Covered Person should include a disclaimer that the views expressed therein do not necessarily reflect the views of the Company. You should be aware that even after a posting is deleted, certain technology may still make that content available to readers.

NO RIGHTS CREATED

This Code is a statement of fundamental principles, policies and procedures that govern Covered Persons in the conduct of Company business. It is not intended to and does not create any legal rights for any customer, supplier, competitor, stockholder or any other non-employee or entity.

AMENDMENT AND WAIVER

The Company maintains its right to amend and update this Code from time to time. Any such amendment or updates will be published on the Company's website and shall become effective as of such publication, and it is the Covered Person's sole responsibility to check the Company's website from time to time.

CODE ADMINISTRATION

The Audit Committee is responsible for reviewing this Code. The Audit Committee or other appropriate officer or body shall investigate and determine, or shall designate appropriate persons to investigate and determine, the legitimacy of any reports of violations under this Code. The Audit Committee or other appropriate officer or body will then determine the appropriate disciplinary action. The Audit Committee may request reports from Company executives about the implementation of this Code and take any other steps in connection with that implementation as it deems necessary.

PUBLICLY AVAILABLE, GUIDANCE AND REPORTING VIOLATIONS

This Code will be posted on Company's website.

Any Covered Person who has any questions about this Code should consult with the Chief Executive Officer, or the Chief Financial Officer or General Counsel, as appropriate in the circumstances. If a Covered Person has any questions about this Code, the Covered Person should ask his or her supervisor how to handle the situation.

Covered Persons are encouraged to report violations. If Covered Person becomes aware of, or reasonably suspect, a violation of applicable laws, rules or regulations, of this Code or other policies of Company, including any evidence of fraud occurring in his or her region, business segment or unit, and that involves any employee or agent of Company, the Covered Person must immediately report such information as further described in Company's Whistleblower Policy.

If the matter concerns accounting or auditing issues, you may report such matter directly to our Chief Financial Officer or the Chairmen of the Audit Committee at report@radcom.com.

A Covered Person who makes reports, in good faith, of suspected violations of applicable laws, rules or regulations, of this Code or other policies of Company, or regarding accounting or auditing issues as described above will be protected from retaliation, as a result of their reports. A person making the report may also elect to make the report on an anonymous basis, but such reports should be very detailed or include means to contact the reporting person. Individuals who file reports or provide information without a good faith, reasonable belief in the truth and accuracy of such information are not protected by this Code and may be subject to disciplinary action.

Annex A

Definition of Confidential Information

“Confidential Information” is typically defined as any part of information disclosed by the Company or by another company to the Company, in whatever form or medium, including written and/or oral, and/or computer information, relating the disclosing party and/or its subsidiaries’ past, present and future business, financial information, commercial information, as well as technical, technological and other proprietary information, including, but not limited to, the computer programs in any form, documentation, installation programs, software code, diagrams, pricing methods, actual products, prototypes, samples, designs, schematics, configurations, specifications, techniques, drawings, kits and all other information of the disclosing’s party.